U. S. Steel
Clairton Works
400 State Street
Clairton, PA 15025-1855

February 28, 1996



Mr. David B. McGuigan, Ph.D.
Chief, Air Enforcement Section
United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107-4431

Subject: U.S. Steel Clairton Works
Modifications and Improvements to Igniter Pilot Systems

Dear Mr. McGuigan:

Our September 15, 1995 submittal of our consultant's report enumerated the steps which we had taken to improve the reliability of our battery igniter flare system. It also listed additional changes which at that time were anticipated. The tasks identified in our submittal and the current status of those tasks are listed below:

- Install a revised size gas nozzle on one pilot (of three) of each of the flare stacks at the second unit batteries. Implementation was anticipated to be complete by November 15, 1995.

  *Status*: The second unit gas nozzle replacement was completed by November 15, 1995.

- Install revised gas nozzles on all batteries. Implementation was anticipated to be complete by February 29, 1996.

  *Status*: Revised gas nozzle replacement was completed on February 23, 1996.

- Additional pipe taps were to be installed on pilot lines to test air/fuel ratios. Implementation was anticipated to be complete by December 15, 1995.

  *Status*: The pipe tap installation was completed by December 15, 1995.

All revisions and modifications have been completed. We anticipate that flare performance will continue to be good. Our recent performance is summarized below.

| Month | Pilots out of Service (Hr:Min) | Online %* |
|---|---|---|
| September, 1995 | 00:00 | 100% |
| October, 1995 | 00:00 | 100% |
| November, 1995 | 00:00 | 100% |
| December, 1995 | 00:00 | 100% |
| January, 1996 | 00:55 | 99.99% |

*Based on hours flares were unavailable due to pilot problems versus battery operating hours.

We have now operated through the winter, which historically had been the problem time of year, with excellent performance. We experienced only one incident during January which was the result of a slow steam leak from a cleanout line into the ignitor pilot lines. The steam leak caused the line to freeze and choke off the pilot gas. This performance contrasts with the performance of the previous winter reported in our September 15 letter, when January's online percentage was 99.44% and February's was 99.94%. The excellent performance is the result of the significant efforts spent to improve the flare reliability.

If you have any questions, please call me at (412) 233-1101.

Sincerely,

H. R. McCollum
Manager, Environmental Control

HRM/kb-96057
cc: Michael Ioff
Bill Gilson, ACHD

U. S. Steel
Clarion Works
400 State Street
Clarion, PA 15025-1855

February 29, 1996

Deputy Director
Allegheny County Health Department
Department of Air Quality
301 Thirty-Ninth Street
Pittsburgh, PA 15201

U.S. Environmental Protection Agency
Region III
Air, Radiation & Toxics Division
841 Chestnut Building
Philadelphia, PA 19107
ATTN: Michael Ioff (3AT23)

Assistant Council
Department of Environmental Resources
Southwest Region
400 Waterfront Drive
Pittsburgh, PA 15222-4745
ATTN: Ward Kelsey, Esq.

Department of Justice
Environmental and Natural Resource Division
Environmental Enforcement Section
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044
ATTN: David Street, Esq.

Subject: USS Reference Number: 96-0037
Coke Oven Gas Flare Pilots
USS Clairton Works

Gentlemen:

The attached form confirms our verbal report of the subject incident. Any questions concerning this matter should be referred to R. P. Spargal at 233-1486.

Very truly yours,

T. W. Goettge
General Manager
Coking Operations

NOTICE OF BREAKDOWN OF EQUIPMENT
ARTICLE XXI - SECTION 2108.01

1. **USS Reference Number:** 96-0037

2. **Date & Time of Breakdown: Date:** 02/29/96 **Time:** 0010 hours

3. **Company Name:** USX Corporation - USS Clairton Works

4. **Specific Equipment Involved or Affected:** #13, 14, 15, 19, 20 Coke Oven Gas Flare Pilots

5. **BAPC Permit Number (if applicable):**

6. **Location:** Clairton, PA

7. **Nature and cause of breakdown:** The coke oven gas flare igniter pilots were out on #13, 14, 15, 19, 20 Batteries. A loss of air pressure occurred when an air supply line located at #7 Quench Tower broke. It is believed that an air operated butterfly valve which regulates the gas flow to the pilots drifted closed.

8. **Identification of Emissions:**

   A. **Type(s) (CO, NOX, SO2, Particulates, Hydrocarbons, etc.)**
   No environmental impact.

   B. **Toxic qualities of each type (including its qualities as an irritant, and its potential for causing illness, disability, or mortality).** Unknown.

   C. **Amount of each type emitted (or likely to be emitted).**
   No environmental impact.

9. **Measures taken (or to be taken) to minimize length of breakdown and amount of emissions, including shutdown or curtailment (or why it is impossible or impractical to do so).**
The coke oven gas flare pilots were re-lit.

10. **Facility back in operation - Date:** 02/29/96 **Time:** 0430 hours

Signature R. P. Spargal Date 2/29/96

R. P. Spargal
Environmental Control Engineer Phone: 233-1467